

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-23182-RAR

C.M., et al.,

Plaintiffs, on behalf of themselves and all those
similarly situated,

v.

Kristi Noem, Secretary of the United States Department
of Homeland Security, in her official capacity, et al.,

Defendants.

STATUS REPORT

Pursuant to the Court's Order of July 23, 2025, ECF No. 16, Plaintiffs respectfully provide the following report regarding service of process in this case, as well as clarification regarding Plaintiffs' Expedited Motion for Temporary Restraining Order and Preliminary Injunction, ECF No. 5.

Plaintiffs have completed service of process to all Defendants in this case, via U.S. Postal Service certified mail delivery and by hand delivery. *See* ECF Nos. 18-19. In addition, on July 17, 2025, Plaintiffs' counsel, Eunice Cho, emailed a courtesy copy of the Complaint and Summons, ECF Nos. 1 to 1-16; Plaintiffs' Expedited Motion for Temporary Restraining Order and Preliminary Injunction and all Exhibits, ECF Nos. 5 to 5-8; and Plaintiffs' Motion for Class Certification and Memorandum of Law In Support, ECF Nos. 6 to 6-4, to the known email addresses of counsel for Defendants as detailed below.

In light of the Court's Order, ECF No. 17, Plaintiffs also respectfully clarify that they intended to file the Expedited Motion for Temporary Restraining Order and Preliminary Injunction, ECF No. 5, as an expedited motion pursuant to SD. Fla. Loc. R. 7.1(d)(2), not as an emergency motion pursuant to S.D. Fla. Loc. R. 7.1(d)(1), and that they wish for the Court to order expedited briefing on the motion.

In addition, Plaintiffs clarify that the Expedited Motion for Temporary Restraining Order and Preliminary Injunction was filed on behalf of the four named plaintiffs, C.M., Michael Borrego Fernandez, J.M.C., and E.R., as well as the proposed class. *See* ECF No. 5 at 1 n.1 (noting irreparable prejudice to "Plaintiffs and proposed class members"); *id.* at 3 ("Detained Plaintiffs, on behalf of themselves and the proposed class . . . respectfully seek a TRO and preliminary injunction . . ."); Proposed Order, ECF No. 5-8 ("Having determined that Detained Plaintiffs . . . and the class are likely to succeed on the merits of their claims . . .").

**Courtesy Emails to Defendants' Counsel
Sent on July 17, 2025**

Federal Defendants (Kristi Noem, Department of Homeland Security, Todd Lyons, Immigration and Customs Enforcement, Garrett Ripa, Sirce Owen, Executive Office for Immigration Review)

- Matthew Feeley, Matthew.feeley@usdoj.gov
- Alicia Welch, Alicia.welch@usdoj.gov
- Stephanie Fidler, Stephanie.Fidler@usdoj.gov

Florida Defendants (Ronald DeSantis, Kevin Guthrie, Florida Division of Emergency Management)

- Jeffrey DeSousa, jeffrey.desousa@myfloridalegal.com
- Nathan Forrester, nathan.forrester@myfloridalegal.com
- Robert Schenck, robert.schenck@myfloridalegal.com
- Jenna Hodges, Jenna.Hodges@myfloridalegal.com
- Christine Lamia, Christine.Lamia@myfloridalegal.com
- Complex Litigation Unit, E-Service, Complex_Litigation_Eservice@myfloridalegal.com
- Christine Pratt, Christine.Pratt@myfloridalegal.com
- David Costello, David.Costello@myfloridalegal.com

Miami-Dade County Defendant (Sherea Green)

- Geri Bonzon-Keenan, gbk@miamidade.gov
- Gerald K. Sanchez, gks@miamidade.gov
- Jess M. McCarty, jmm2@miamidade.gov

Dated: July 25, 2025

Respectfully Submitted,

Paul R. Chavez (Fla. Bar No. 1021395)
Christina LaRocca (Fla. Bar No. 1025528)
AMERICANS FOR IMMIGRANT
JUSTICE
2200 NW 72nd Ave
P.O. Box No 520037
Miami, FL 33152
786-218-3381
pchavez@aijustice.org
clarocca@aijustice.org

Amy Godshall, Fla. Bar No. 1049803
Daniel Tilley, Fla. Bar No. 102882
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF FLORIDA
4343 West Flagler Street, Suite 400
Miami, FL 33134
786-363-2714
agodshall@aclufl.org
dtalley@aclufl.org

/s/ Eunice H. Cho

Eunice H. Cho*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
915 15th St. N.W., 7th Floor
Washington, DC 20005
202-548-6616
echo@aclu.org

Corene Kendrick*
Kyle Virglen*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
425 California Street, Suite 700
San Francisco, CA 94104
(415) 343-0770
ckendrick@aclu.org
kvirglen@aclu.org

Attorneys for Plaintiffs

** Admitted pro hac vice.*